

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

2018 JAN -8 PM 1:12

DEPUTY CLERK VLD

UNITED STATES OF AMERICA

v.

NO. 5:12-CR-078-01

JEFFREY DAVID GUNSELMAN,
INDIVIDUALLY AND D.B.A ABSOLUTE
FUELS, LLC.

.....

DEFENDANT'S MOTION FOR EXTENSION OF TIME
TO RESPOND AND REQUEST FOR DISCOVERY

COME NOW, Jeffrey Gunselman, Defendant, moves this Court for an extension of 90 days with which to respond to the Government's motion to apply seized assets to judgment. Additional time is needed in order to properly and fairly respond. As the Defendant is indigent and thusly burdened with limitations and to research, formatting, and filing.

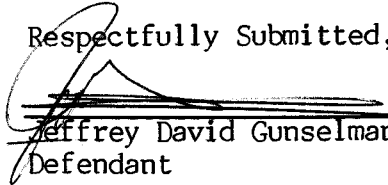
Additionally, Defendant moves this Court to provide discovery presently unavailable but necessary to response. Per the Government's brief a payment history report was to be included as exhibit B (page 2, item 3 lines 4,5). This document was not provided to the Defendant. The following additional documents are requested by the Defendant as well:

- 1). Copies of search and seizure warrants executed on or about October 19, 2011.
- 2). Any and all temporary restraining orders granted against Defendant.
- 3). Any additional search and seizure orders or warrants issued in regards to this case.
- 4). Contract between Absolute Fuels and Gavilon LLC., which included the "B100 Biodiesel with renewable identification numbers (RINS)", as well as any and all documentation of transaction.
- 5). Copy of filed notice of lien issued by Government against Defendant.
- 6). Any ^{NOTICE} of violation issued by the Government against Gavilon LLC., specifically for invalid RINS.

- 7). Final orders of forfeiture referenced by the Government as docket items 146 and 156.
- 8). All information and documentation pertaining to the initial seizure and transfer of funds referenced by the Government in their motion.
- 9). All work product generated by USSS and Prosecution, including notes and correspondance.
- 10). All correspondance between Govenment and Defendant, Defendant's legal Counsel[s], Employees, and Family members.

WHEREFORE, PREMISES CONSIDERED, the Defendant humbly request this court allow an extension of 90 days, or such time as the Court finds reasonable, for filing of a response to the Government's motion to apply seized assets, as well as an order to provide discovery to defendant.

Respectfully Submitted,

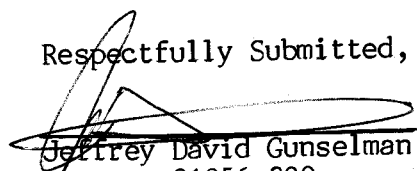

Jeffrey David Gunselman
Defendant

CERTIFICATE OF SERVICE

I, Jeffrey David Gunselman, Defendant, certify that a true and accurate copy of Defendant's motion for Extension of Time to Respond and Request for discovery was placed into the United States Mail, first-class postage prepaid on January 3, 2018, to: George H. Mahon Federal Building, United States Courthouse, 1205 Texas Avenue, Room 209, Lubbock, Texas 79401.

Executed on 03 day of January, 2018.

Respectfully Submitted,

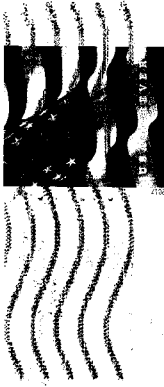


Jeffrey David Gunselman
Reg No. 01056-380
F.C.I. Elkton
P.O. Box 10
Lisbon, OH 44432

GROUSELMAN
#01056380
FBI ELKTON
PO BOX 10
LISBON OH 44432

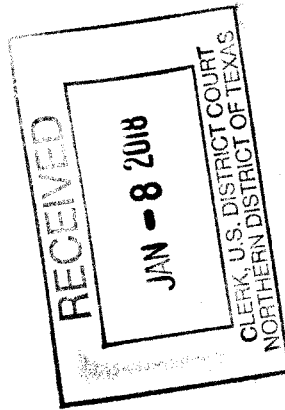
SECRET

THE STATE OF TEXAS,
COUNTY OF DALLAS.



⇔01056-380⇔

District Clerk
1205 Texas Ave
Lubbock, TX 79401
United States



09-07-2016